Remarks

Claims 1-20 are pending in the application and the same are rejected. Claims 1-20 are presented for review and further consideration by the Examiner.

The Examiner has rejected claims 1-20 under 35 U.S.C. § 102(e) as being anticipated by Simon, U.S. Patent No. 6,065,008. The Examiner states that Simon teaches opening a printer metrics file, reading one set of the at least one set of font metrics from the printer metrics file, and creating an operating system font from the one read set of font metrics (Examiner's Action, page 2, ¶ 2). Further the Examiner states that Simon discloses applying a read set of font metrics to a font template and saving the font template with the applied font metrics as an operating system font.

Applicants respectfully traverse the rejection of claims 1-20 under 35 U.S.C. § 102(e).

Simon discloses a system and method for secure font subset distribution. A font creator develops digitally signed font files (col. 3, lines 52-57). A signing module is invoked to digitally sign the font files. The signing module constructs an authentication tree for a font, digitally signs the root of the authentication tree, and stores the digital signature along with the font in a font file (col. 4, lines 22-32). Simon does not disclose how the font was created for which the signing module constructs the authentication tree. In particular, Simon does not disclose the signing module creating the font for which the signing module constructs the authentication tree. Therefore, Simon does not disclose the signing module creating an operating system font, but rather digitally signs an already existing font.

The Examiner additionally suggests that the font file disclosed by Simon is analogous to the printer metric file of Applicants' claims. The Examiner states, "If the font file 50 is not a printer metrics file, the font file have the same characteristic with the printer metrics file because the font file have elements is included in the file such as s set of characters with the typeface, style, scalability, stoke weight (e.g. bold), size..."

Simon discloses that the font file includes a digital signature together with the font (col. 4, lines 30-32). Simon does not disclose how the font referred to is created, but it is apparent that the font is not created from information read from the font file,

since the font file is created from the font. Therefore, the font file disclosed by Simon cannot be analogous to the printer metric file of Applicants' claims since Applicants' claims describe a font created from a set of printer metrics read from a printer metrics file.

Additionally, Simon does not disclose creating a font at all. An already existing font is merely digitally signed, transferred between computers, authenticated, and installed on a computer. The font is stored in the font file. By stating that the font file is analogous to the printer metrics file of Applicants' claims, the Examiner is stating that Simon discloses creating a font from a font. Creating a font from a font is not analogous to creating a font from a printer metric file since a printer metric file does not contain all of the information that a font contains.

Furthermore, it is clear that Simon does not disclose the signing module opening the font file and reading a set of font metrics from the font file. The signing module constructs the font file (col. 4, lines 30-32 and 62-63). Therefore, if the font file disclosed by Simon were analogous to Applicants' printer metric file, then the signing module of Simon neither opens a printer metric file nor reads a set of font metrics from a printer metric file.

In fact, the font disclosed by Simon is merely distributed from one computer to another in a secure manner. Simon does not disclose the creation of any new font from information in the font file. Therefore, the font file disclosed in Simon cannot be analogous to the printer metrics file of Applicants' claims.

The Examiner also suggests that the authentication module 76 of the client disclosed in Simon creates the operating system font as recited in Applicants' claims. While it is clear that the client receives a font file or a font subset file from a distributor server, no new font is created by the client. The existing font is merely verified by the authentication module of client and installed on the client.

Additionally, the authentication module does not read a set of printer metrics from the font file. The authentication module merely reconstructs the root of the authentication tree and compares the reconstructed root to the root stored in the font file. If there is a match, the font file is authenticated. The only structure the authentication module is disclosed to create is the reconstructed root of the authentication tree. (Col. 5, lines 25-35). As discloses in Simon, the root of the

authentication tree is merely a hash value acting as an identifier for the data of the font file. The root of the authentication tree is not in itself a font.

Furthermore, as described above, the font file is not analogous to the printer metrics file of Applicant's claims.

In summary, Simon does not disclose an analog to the printer metrics file of Applicants' claims and therefore cannot disclose opening a printer metrics file. Simon does not disclose creating an operating system font from a set of printer metrics or even creating an operating system font.

In contrast, Applicants' invention as expressed in independent claims 1, 8, and 14 includes opening a printer metrics file, reading a set of font metrics from the printer metrics file, and creating an operating system font from the read font metrics.

As to claims 3, 10, and 16, Simon does not disclose applying font metrics to a font template and saving them together as a font.

The Examiner suggests that the signing module would inherently apply a set of read font metrics to a font template and save them as an operating system font (Examiner's Action, page 3). The Examiner further suggests that glyph outlines would be an analog to the font template of Applicants' claims.

Simon does not even disclose the signing module applying printer metrics to glyph outlines and saving them as a font. The Examiner has not presented any explanation to suggest that the signing module would inherently apply a set of read font metrics to glyph outlines and save them as an operating system font.

Additionally, Simon does not disclose the signing module reading any font metrics, nor applying them to anything. As discussed above, the signing module of Simon merely constructs an authentication tree for a font, digitally signs the root of the authentication tree, and stores the digital signature along with the font in a font file (col. 4, lines 22-32). Simon does not disclose any need or reason for the signing module to apply any information to a font template or a glyph outline.

In view of Applicants' arguments with respect to independent claims 1, 8, and 14 being allowable, Applicants respectfully submit that the remaining dependent claims are also allowable because they contain all of the limitations of their respective

independent claims and further add structural and functional limitations.

The foregoing arguments are believed to be a complete response to the outstanding Examiner's Action.

No new matter has been added.

It is respectfully submitted that there is no claim, teaching, motivation, or suggestion in any of the cited art, alone or in combination, to produce what Applicants claim.

It is further submitted that the application defines patentable subject matter and that the claims are in a condition for allowance. Such allowance at an early date is respectfully requested.

Should any issues remain which would preclude the prompt disposition of this case, it is requested that the Examiner contact the undersigned practitioner by telephone.

Respectfully submitted,
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